

GRS 4.2 additions

Information Access and Protection Records

This file contains three documents. The draft schedule is proposed as a new General Records Schedule. The Appraisal Memorandum provides additional background explanation and includes the appraiser's justification for the retention decisions proposed in the schedule. The Crosswalk matches authorities in the draft schedule with current GRS authorities.

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Additions to General Records Schedule 4.2: Information Access and Protection Records

Draft for Initial SHU review * October 9, 2015

Item	Records Description	Disposition Instruction	Disposition Authority	
005	<p>General program administration records. Records such as routine correspondence, memoranda, schedules, tracking calendars and spreadsheets, workload assignments and reporting, and other records created in the course of <i>general</i> agency administration and implementation of programs overseeing public access to, classification and control of, and accounting for agency information.</p> <p>Supersedes: GRS 14, item 15 (N1-GRS-98-2 item 12) GRS 14, item 26 (N1-GRS-98-2 item 13) GRS 18, item 1 (GRS 18, 1960, item 2)</p>	<p>Temporary. Destroy when 3 years old, but longer retention is authorized if required for business use.</p>	DAA-GRS-2016-000x-0001	
150	<p>System of Records Notices (SORNs). Agency copy of notices of the existence and character of systems of records documenting publication in the Federal Register upon system establishment or revision per the Privacy Act of 1974 [5 U.S.C. 552a(e)(4) and 5 U.S.C. 552a(e)(11)], as amended.</p>	<p>Temporary. Destroy upon supersession by a revised SORN or 1 year after system ceases operation, but longer retention is authorized if required for business use.</p>	DAA-GRS-2016-000x-0002	
160	<p>Records analyzing Personally Identifiable Information (PII). Records showing how PII is collected, used, shared, and maintained, and demonstrating that privacy protections are incorporated into records systems, created as required by the E-Government Act of 2002 (Public Law 107-347, section 208).</p>	<p>Records of Privacy Impact Assessments (PIAs).</p>	<p>Temporary. Destroy 5 years after a superseding PIA is published or after system ceases operation, but longer retention is authorized if required for business use.</p>	DAA-GRS-2016-000x-0003
161		<p>Records of privacy notices concerning websites used by the public.</p>	<p>Temporary. Destroy 5 years after superseding notice is published or when website is no longer available to public, but longer retention is authorized if required for business use.</p>	DAA-GRS-2016-000x-0004

Item	Records Description	Disposition Instruction	Disposition Authority
162		Records of Privacy Threshold Analyses (PTAs). Temporary. Destroy 5 years after associated PIA is published or determination that PIA is unnecessary, but longer retention is authorized if required for business use.	DAA-GRS-2016-000x-0005
170	Computer matching program notices and agreements. Agency copy of notices of intent to share systems of records with other Federal, state, or local government agencies via computer matching programs, and related records documenting publication of notice in the Federal Register per the Privacy Act of 1974 [5 U.S.C. 552a(e)(12)], as amended. Also agreements between agencies, commonly referred to as Computer Matching Agreements, prepared in accordance with Office of Management and Budget Final Guidance Interpreting the Provisions of Public Law 100-503 as published in the Federal Register June 19, 1989 (54 Fed. Reg. 25818).	Temporary. Destroy upon supersession by a revised notice or agreement, or 1 year after matching program ceases operation, but longer retention is authorized if required for business use.	DAA-GRS-2016-000x-0006



NATIONAL ARCHIVES

Date: October 8, 2015
Appraiser: Galen R. Wilson, ACNR
Agency: General Records Schedules (GRS)
Subject: Additions to GRS 4.2 (DAA-GRS-2016-000X)

INTRODUCTION

Schedule Overview

GRS 4.2 Records of Information Access and Protection (Additions)

Additional Background Information

This schedule adds six items to GRS 4.2 to cover general program records and records unique to Systems of Records Notices (SORNs) and Privacy Impact Assessments (PIAs).

Overall Recommendation

I recommend approval of this schedule.

APPRAISAL

Item 0001 (GRS 4.2, item 005): General program administration records.

Proposed Disposition

Temporary

Appropriateness of Proposed Disposition

Appropriate

Appraisal Justification

*Previously approved as temporary:

GRS 14, item 15 (N1-GRS-98-2 item 12)

GRS 14, item 26 (N1-GRS-98-2 item 13)

GRS 18, item 1 (GRS 18, 1960, item 2)

*Has little or no research value. These records are administrative in nature.

Adequacy of Proposed Retention Period

Adequate from the standpoint of legal rights and accountability. The three superseded items each specified 2-year retention. The extension of this to 3 years is in response to GRS 6.1 (Email Managed under a Capstone Approach), item 012, which sets a minimum retention of 3 years for general administrative correspondence.

Media Neutrality

Approved

Item 0002 (GRS 4.2, item 150): System of Records Notices (SORNs).

A SORN is required when personally identifiable information (PII) is maintained by a Federal agency in a system of records and the information is retrievable by a personal identifier. The

SORN describes, among other things, the purpose of the collection, information sharing, categories of records and individuals covered, record retention and destruction, and how records are retrieved within the system.

Proposed Disposition

Temporary

Appropriateness of Proposed Disposition

Appropriate

Appraisal Justification

*Has little or no research value. A SORN serves only to inform the public what private information is maintained in a system of records. When a system is decommissioned and its records destroyed, its SORN is of no further value. Nor does a SORN have use as a finding aid if a system of records is permanently retained.

Adequacy of Proposed Retention Period

Adequate from the standpoint of legal rights and accountability. The business value of a SORN is tied to the system to which it refers. Such a system may function for many years, during which time the SORN is of vital interest to those whose identifiable information is held there. But when the system is no longer in operation the informational value of the SORNs dries up almost immediately, and this is reflected in the one-year retention period. One agency questioned the short retention of a superseded SORN, but then agreed with NARA's General Counsel that the Federal Register contains the permanent record of the beginning and ending dates of any SORN's being in effect. The flexible retention period permits agencies to retain superseded SORNs longer than 1 year if needed for business use.

Media Neutrality

Approved

Item 0003 (GRS 4.2, item 160): Records of Privacy Impact Assessments (PIAs).

Item 0004 (GRS 4.2, item 161): Records of privacy notices concerning websites used by the public.

Item 0005 (GRS 4.2, item 162): Records of Privacy Threshold Analyses (PTAs).

These items document the Federal government's analysis of how privacy protections are incorporated into its records systems. Item 160 concerns PIAs posted on the web; item 161 covers PIAs *about* websites. They are addressed separately because each links retention to a different cutoff. If these items were merged them into a single item, the important detail about PIAs being germane to some websites would be relegated to the FAQs and perhaps overlooked. Item 162 covers research that determines whether a PIA is even necessary. It is a separate item because its retention is linked to the date of PIA publication or determination that a PIA is unnecessary. This may be many years before its associated PIA ceases to be an active record.

Proposed Disposition

Temporary

Appropriateness of Proposed Disposition

Appropriate

Appraisal Justification

* Has little or no research value. These records have no context separate from temporary records systems or websites to which they refer. Nor do they add unique information useful to researcher understanding of a permanent system.

Adequacy of Proposed Retention Period

Adequate from the standpoint of legal rights and accountability. These records, while very important when a system of records is active, lose value rapidly after a system is decommissioned or otherwise brought down. Five-year retention was suggested by subject area experts as the length of time they anticipate active business use for the records.

Media Neutrality

Approved

Item 0006 (GRS 4.2, item 170): Computer program matching notices and agreements.

A notice is required to be published in the Federal Register when government agencies “match” computer programs with other Federal, state, or local government agencies. Computer matching is a key component in curbing fraud and catching criminals. A recent example was the Office of Child Support Enforcement’s June 10, 2015 publication of intent to share its National Directory of New Hires with state agencies administering unemployment compensation programs. Agencies are also required to enter into agreements with the other agency regarding sent or received records sets covering numerous parameters outlined in OMB’s Final Guidance Interpreting the Provisions of Public Law 100-503, such as use of the records and security protection safeguards.

Proposed Disposition

Temporary

Appropriateness of Proposed Disposition

Appropriate

Appraisal Justification

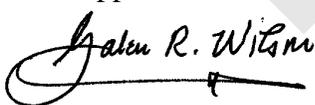
*Has little or no research value. A computer program matching notice serves only to inform the public what private information is shared with non-Federal government agencies. The systems most likely to be involved are rapidly changing and rarely of permanent value. The important information—the basic fact that information was shared with a non-Federal agency—survives permanently in the Federal Register itself.

Adequacy of Proposed Retention Period

Adequate from the standpoint of legal rights and accountability. The business value of a computer matching program is obvious. Matching may continue for many years, during which time the fact of information-sharing and the agreement monitoring that sharing are of interest to those whose identifiable information is held in such systems. Like SORNs (item 0002), when a computer matching program ceases, the informational value of the notice also ceases. One-year retention should cover any business need for the information.

Media Neutrality

Approved



GALEN R. WILSON
Senior Records Analyst

New GRS 4.2				Old GRS			
GRS No.	Item No.	Retention	ERA Number/Disposition Authority	GRS No.	Item No.	Retention	Disposition Authority
4.2	005	3 years	DAA-GRS-2016-000x-0001	14	15	2 years	N1-GRS-98-2 item 12
				14	26	2 years	N1-GRS-98-2 item 13
				18	1	2 years	GRS 18, 1960, item 2
4.2	150	Superseded or 1 year	DAA-GRS-2016-000x-0002	New item			
4.2	160	5 years	DAA-GRS-2016-000x-0003	New item			
4.2	161	5 years	DAA-GRS-2016-000x-0004	New item			
4.2	162	5 years	DAA-GRS-2016-000x-0005	New item			
4.2	170	Superseded or 1 year	DAA-GRS-2016-000x-0006	New item			

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